

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE URETHANE ANTITRUST
LITIGATION

This Document Relates to: All Actions

Civil Action No. 08-5169 (WJM)(MF)

**PLAINTIFFS' PROPOSED
VERDICT FORM**

Plaintiffs respectfully submit the following proposed verdict form:

We, the jury, impaneled and sworn in the above-entitled case, upon our oaths, do make the following answers to the questions propounded by the Court:

1. Do you find that Plaintiffs have proved, by a preponderance of the evidence and in accordance with the instructions given to you, that Dow knowingly participated in a conspiracy to fix, raise, or stabilize prices for urethane chemicals?

Yes _____ No _____

If your answer to Question 1 is "Yes," proceed to Question 2. If your answer to Question 1 is "No," do not answer any remaining questions, and proceed to the signature page.

2. Do you find, by a preponderance of the evidence and in accordance with the instructions given to you, that the following Plaintiff families suffered antitrust impact?

- | | | |
|-------------------------------|-----------|----------|
| a. British Vita Plaintiffs | Yes _____ | No _____ |
| b. Carpenter Plaintiffs | Yes _____ | No _____ |
| c. Flexible Foam Plaintiffs | Yes _____ | No _____ |
| d. Foam Supplies Plaintiffs | Yes _____ | No _____ |
| e. Hickory Springs Plaintiffs | Yes _____ | No _____ |
| f. Huber Plaintiffs | Yes _____ | No _____ |
| g. Leggett & Platt Plaintiffs | Yes _____ | No _____ |
| h. Lubrizol Plaintiffs | Yes _____ | No _____ |
| i. MarChem Plaintiffs | Yes _____ | No _____ |
| j. Skypark Plaintiffs | Yes _____ | No _____ |
| k. Woodbridge Plaintiffs | Yes _____ | No _____ |

If your answer to Question 2 is “Yes” as to at least one Plaintiff family, proceed to Question 3. If your answer to Question 2 is “No” as to all Plaintiff families, do not answer any remaining questions, and proceed to the signature page.

3. Do you find that Plaintiffs have proved, by a preponderance of the evidence and in accordance with the instructions given to you, their claim of fraudulent concealment?

Yes _____ No _____

If your answer to Question 3 is “Yes,” proceed to Question 4. Only if your answer to Question 3 is “No,” proceed to question 5.

4. State the amount of damages proved by Plaintiffs.

\$_____

Do not answer any remaining questions, and proceed to the signature page.

5. State the amount of damages proved by Plaintiffs, excluding any amounts relating to purchases prior to November 24, 2000.

\$_____

Do not answer any remaining questions, and proceed to the signature page.

Your deliberations are complete. Please have the foreperson sign and date this verdict form and notify the Court that you have reached a verdict.

Date: _____ Foreperson: _____

Dated: April 4, 2016

Respectfully Submitted,

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO
Attorneys for Plaintiffs

By: /s/ James E. Cecchi
JAMES E. CECCHI

Jeffrey M. Johnson
Adam Proujansky
Daniel P. Schaefer
Alex E. Hassid
BLANK ROME LLP
1825 Eye Street, NW
Washington, DC 20006
(202) 420-2200

Richard J. Leveridge
ADAMS HOLCOMB, LLP
1875 Eye Street, NW
Washington, DC 20006
(202) 580-8818

James R. Martin
ZELLE LLP
1220 L Street, NW
Suite 100-143
Washington, DC 20005
(202) 359-6688

Attorneys for Plaintiffs